



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

March 7, 2018
Certified Mail/Return
7012 3460 0003 1112 9066

Orland Mobile Home Park
3186 Kensington Drive
El Dorado Hills, CA 95762

Attention: Scott & Kathy Arbuckle, Owners

Subject: Public Water System No. 1100445 – Citation No. 21-18C-010 for Lead and Copper Rule monitoring violation.

It has come to our attention that the Orland Mobile H.P. water system did not monitor and report lead and copper samples in the year 2017, according to directives defined in Citation No. 21-15C-013, sent by the Division of Drinking Water on March 9, 2015. Consequently, the Division of Drinking Water has issued the enclosed Citation for Noncompliance (Citation) with Title 22 California Code of Regulations, Sections 64675 and 64690.1.

Please review the enclosed Citation and note directives for corrective action and public notification.

If you have any questions please call Paul Rowe at (530) 224-4866 or contact me directly at (530) 224-4861.

A handwritten signature in black ink, appearing to read "R. Crenshaw".

Reese B. Crenshaw, P.E.
Valley District Engineer
DRINKING WATER FIELD
OPERATIONS BRANCH

Enclosures

1 STATE WATER RESOURCES CONTROL BOARD

2 DIVISION OF DRINKING WATER

3
4 **Public Water System:** Orland Mobile Home Park

5 **Water System No.:** 1100445

6
7 **To:** Orland Mobile Home Park
8 Attn: Scott and Kathy Arbuckle, Owners
9 3186 Kensington Drive
10 El Dorado Hills, CA 95762

11
12 **Issued:** March 7, 2018
13 VIA CERTIFIED MAIL

14
15
16 **CITATION NO. 21-18C-010 FOR NONCOMPLIANCE**

17 **with Title 22 California Code of Regulations**

18 **Sections 64675 and 64690**

19
20 Section 116650 of the California Health and Safety Code (CHSC) authorizes the
21 issuance of a citation for failure to comply with a requirement of the California Safe
22 Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4, commencing with
23 Section 116270), or any regulation, standard, permit, or order issued thereunder.

24
25 The State Water Resources Control Board, acting by and through its Division of
26 Drinking Water (hereinafter "Division") and the Deputy Director for the Division,

1 hereby issues a citation to the Orland Mobile Home Park for failure to comply with
2 Sections 64675 and 64690, Title 22, of the California Code of Regulations (CCR).

3
4 **APPLICABLE AUTHORITIES**

5
6 **STATEMENT OF FACTS**

7 The Orland Mobile Home Park (Water System) is classified as a community water
8 system serving approximately 54 people. Because the Water System meets a
9 reduced lead and copper sampling frequency, it is required to collect five (5) lead and
10 copper samples every three years according to Table 64675-A and section 64675.5 of
11 Title 22. The Water System failed to collect and report lead and copper samples for
12 the final year in the period ending in 2014. Citation No. 21-15C-022 was issued by the
13 Division of Drinking Water on March 9, 2015, directing Orland Mobile Home Park
14 Water System to conduct lead and copper monitoring in June, July, August, or
15 September of 2015, and then again in June, July, August, or September of 2017
16 before returning to a triennial sample schedule. The last samples submitted to the
17 Division were taken in September 2015.

18
19
20
21 **DETERMINATIONS**

22 The Division has determined that the Water System violated Section 64675.5(a)(1)
23 and Section 64690.1, Title 22, of the CCR, in that the Water System failed to collect
24 and report lead and copper samples in 2017.

1 **DIRECTIVES**

2 The Water System is hereby directed to take the following actions:

- 3
- 4 1. Comply with Section 64675.5(a)(2), Title 22, of the CCR in all future
- 5 monitoring periods.
- 6
- 7 2. **Conduct lead and copper monitoring from customer's taps in June,**
- 8 **July, August, or September of 2018, and then again in June, July,**
- 9 **August, or September of 2020. Thereafter, assuming results are**
- 10 **acceptable, triennial sampling (every three years) may resume.**
- 11 Samples shall be collected in accordance with the Lead and Copper Rule
- 12 Sampling per Title 22, Section 64677. The analytical results must be
- 13 reported to the Division by the 10th day of the month following the month in
- 14 which the analysis was completed.
- 15
- 16 3. The Water System shall provide public notification (by inclusion in the **2017**
- 17 **Consumer Confidence Report**) of the failure to sample lead and copper,
- 18 as required by the Lead and Copper regulations. Failure to conduct this
- 19 notification will require a Tier 2 notification utilizing the provided document
- 20 in Attachment B. You must return the proof of notification in Attachment C
- 21 by no later than July 1, 2018, for either notification method.
- 22

23 All documents required by this Citation to be submitted to the Division shall be

24 submitted to the following address:

25

26



1 Reese B. Crenshaw, P. E.
2 Valley District Engineer
3 Drinking Water Field Operations
4 Division of Drinking Water
5 State Water Resources Control Board
6 364 Knollcrest Drive, Suite 101
7 Redding, CA 96002
8 (530) 224-4800
9

10 Nothing in this Citation relieves the Water System of its obligation to meet the
11 requirements of Health and Safety Code, Division 104, Part 12, Chapter 4 (California
12 Safe Drinking Water Act), or any regulation, permit, standard or order issued or
13 adopted thereunder.
14

15 The Division reserves the right to make such modifications to this Citation, as it may
16 deem necessary to protect public health and safety. Such modifications may be
17 issued as amendments to this Citation and shall be effective upon issuance.
18

19 **FURTHER ENFORCEMENT ACTION**

20 The California SDWA authorizes the State Board to: issue citation with assessment of
21 administrative penalties to a public water system for violation or continued violation of
22 the requirements of the California SDWA or any permit, regulation, permit or order
23 issued or adopted thereunder including, but not limited to, failure to correct a violation
24 identified in a citation or compliance order. The California SDWA also authorizes the
25 State Board to take action to suspend or revoke a permit that has been issued to a
26 public water system if the system has violated applicable law or regulations or has



1 failed to comply with an order of the State Board; and to petition the superior court to
2 take various enforcement measures against a public water system that has failed to
3 comply with violates an order of the State Board. The State Board does not waive any
4 further enforcement action by issuance of this citation.

5
6 **PARTIES BOUND**

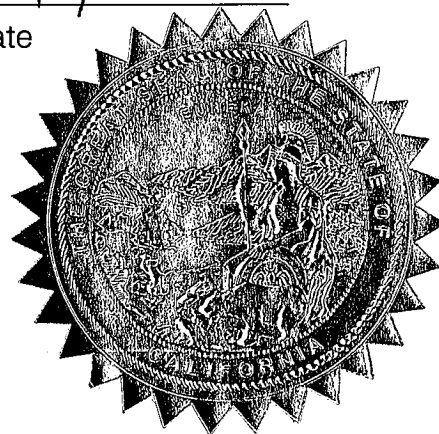
7 This Citation shall apply to and be binding upon the Water System, its officers,
8 directors, agents, employees, contractors, successors, and assignees.

9
10 **SEVERABILITY**

11 The directives of this Citation are severable, and the Water System shall comply with
12 each and every provision thereof notwithstanding the effectiveness of any other
13 provision.

14
15
16
17 R. Crenshaw
18 Reese B. Crenshaw, P.E., District Engineer
19 Valley District
20 Drinking Water Field Operations Branch
21

3/7/18
Date



22 **Attachments:**

- 23 Attachment A: Applicable Authorities
24 Attachment B: Public Notification Document
25 Attachment C: Proof of Public Notification
26 Attachment D: CITATION NO. 21-15C-022

APPLICABLE AUTHORITIES

Enforcement Actions

Section 116650 of the CHSC states in relevant part:

- (a) If the Department determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the department may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.*
- (b) Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.*
- (c) A citation may specify a date for elimination or correction of the condition constituting the violation.*
- (d) A citation may include the assessment of a penalty as specified in subdivision (e).*
- (e) The department may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation.*

Petitions to Orders and Decisions

Section 116701 of the CHSC states in relevant part:

- (a) Within 30 days of issuance of an order or decision issued by the deputy director under Article 8 (commencing with Section 116625) or Article 9 (commencing with Section 116650), an aggrieved person may petition the state board for reconsideration. Where the order or decision of the deputy director is issued after a hearing under Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, this section shall apply instead of Section 11521 of the Government Code.*
- (b) The petition shall include the name and address of the petitioner, a copy of the order or decision for which the petitioner seeks reconsideration, identification of the reason the petitioner alleges the issuance of the order was inappropriate or improper, the specific action the petitioner requests, and other information as the state board may prescribe. The petition shall be accompanied by a statement of points and authorities of the legal issues raised by the petition.*
- (c) The evidence before the state board shall consist of the record before the deputy director and any other relevant evidence that, in the judgment of the state board, should be considered to implement the policies of this chapter. The state board may, in its discretion, hold a hearing for receipt of additional evidence.*
- (d) The state board may refuse to reconsider the order or decision if the petition fails to raise substantial issues that are appropriate for review, may deny the petition upon a determination that the issuance of the order or decision was appropriate and proper, may set aside or modify the order or decision, or take other*

ATTACHMENT A

appropriate action. The state board's action pursuant to this subdivision shall constitute the state board's completion of its reconsideration.

- (e) The state board, upon notice and hearing, if a hearing is held, may stay in whole or in part the effect of the order or decision of the deputy director.*
- (f) If an order of the deputy director is subject to reconsideration under this section, the filing of a petition for reconsideration is an administrative remedy that must be exhausted before filing a petition for writ of mandate under Section 116625 or 116700.*

Lead and Copper Regulations

Section 64675.5, Title 22, of the CCR states in relevant part:

- (a) A system shall conduct standard tap sampling for two consecutive periods; thereafter, tap sampling frequency may be reduced pursuant to section 64675 (General Requirements for Tap Sampling for Lead and Copper) as follows:*
 - (1) If a system has 90th percentile levels that do not exceed 0.005 mg/L for lead and 0.65 mg/L for copper for two consecutive periods, it may reduce the sampling to once every three years at the reduced number of sites.*

Section 64690.1, Title 22, of the CCR states in relevant part:

Each system shall report the following within the first 10 days after the end of each period during which such sampling or monitoring was conducted:

- (a) For lead and copper tap sampling:*

ATTACHMENT A

- (1) The results of all tap samples including the location of each site and the associated tier criteria from section 64676 (Sample Site Selection);*
- (2) The 90th percentile lead and copper concentrations calculated pursuant to section 64678 (Determination of Exceedances of Lead and Copper Action Levels); and*
- (3) With the exception of the first period of tap sampling, an identification of any site that was not sampled during previous periods, along with an explanation of why the sampling site was changed;*

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Este informe contiene información muy importante sobre su agua potable.
Tradúzcalo o hable con alguien que lo entienda bien.

**ORLAND MOBILE HOME PARK FAILED TO COLLECT
LEAD AND COPPER SAMPLES FOR 2017**

Our water system recently violated a water quality monitoring requirement. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we did to correct this situation.

What should you do?

- There is nothing you need to do at this time.
- If you have health issues concerning the consumption of this water, you may wish to consult your doctor.

What happened? What was done?

Orland Mobile Home Park failed to collect and report 5 lead and copper samples in 2017, as required by state and federal regulations. These regulations require that public water systems notify their customers for monitoring violations.

Orland Mobile Home Park will collect this sample on _____, 2018.

For more information, please contact Scott & Kathy Arbuckle at 916-939-1766.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly. You can do this by posting this public notice in a public place or distributing copies by hand or mail.

This notice is being posted by the Orland Mobile Home Park.

State Water System ID#: 1100445. Date distributed: _____.

CERTIFICATION OF COMPLETION OF PUBLIC NOTIFICATION

This form when completed and returned to the Division of Drinking Water and Environmental Management (364 Knollcrest Drive, Suite 101, Redding, CA 96002 or fax to 530-224-4844), serves as certification that public notification to water users was completed as required by the California Water Quality and Monitoring Regulations. Completing public notification and providing the Department with certification is important. Failure to do so will result in additional hourly time charges to your water utility and may result in a formal enforcement action with monetary penalties.

Public Water System Name Orland Mobile Home ParkPublic Water System No. 1100445

Public notification for the 2017 LCR monitoring failure was performed by the following method(s):

Check and Complete

- a) _____ By posting of the notice in conspicuous locations served by the water system.

List locations: _____

For this method, provide the date(s) that the notice was posted _____

I hereby certify that the above information is factual.

Printed Name

Signature

Date _____



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

March 9, 2015
Certified Mail/Return
7012 3460 0003 1113 1762

Orland Mobile Home Park
3186 Kensington Dr.
El Dorado Hills, CA 95762

Attention: Scott and Kathy Arbuckle, Owners

Subject: Public Water System No. 1100445 – Citation No. 21-15C-022 for Lead and Copper Rule monitoring violation.

It has come to our attention that the Orland Mobile Home Park water system did not monitor and report lead and copper samples in the year 2014, according to the Lead and Copper Rule (LCR). Consequently, the Division of Drinking Water has issued the enclosed Citation for Noncompliance (Citation) with Title 22 California Code of Regulations, Sections 64675 and 64690.

Please review the enclosed Citation and note directives for corrective action and public notification.

If you have any questions please call Paul Rowe at (530) 224-4866 or contact me directly at (530) 224-4861.

A handwritten signature in black ink, appearing to read "R. Crenshaw".

Reese B. Crenshaw, P.E.
Valley District Engineer
DRINKING WATER FIELD
OPERATIONS BRANCH

Enclosures

1 STATE WATER RESOURCES CONTROL BOARD

2 DIVISION OF DRINKING WATER

3
4 **Public Water System:** Orland Mobile Home Park

5 **Water System No.:** 1100445

6
7 **To:** Orland Mobile Home Park
8 Attn: Scott and Kathy Arbuckle, Owners
9 3186 Kensington Dr.
10 El Dorado Hills, CA 95762

11
12 **Issued:** March 9, 2015
13 VIA CERTIFIED MAIL
14

15
16 **CITATION NO. 21-15C-022 FOR NONCOMPLIANCE**

17 **with Title 22 California Code of Regulations**

18 **Sections 64675 and 64690**
19

20 Section 116650 of the California Health and Safety Code (CHSC) authorizes the
21 issuance of a citation for failure to comply with a requirement of the California Safe
22 Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4, commencing with
23 Section 116270), or any regulation, standard, permit, or order issued thereunder.

24
25 The State Water Resources Control Board, acting by and through its Division of
26 Drinking Water (hereinafter "Division") and the Deputy Director for the Division,

1 hereby issues a citation to Orland Mobile Home Park for failure to comply with
2 Sections 64675 and 64690, Title 22, of the California Code of Regulations (CCR).

3
4 **APPLICABLE AUTHORITIES**

5 Section 116650 of the CHSC states:

6
7 *(a) If the department determines that a public water system is in violation*
8 *of this chapter or any regulation, permit, standard, citation, or order*
9 *issued or adopted thereunder, the department may issue a citation to*
10 *the public water system. The citation shall be served upon the public*
11 *water system personally or by certified mail. Service shall be deemed*
12 *effective as of the date of personal service or the date of receipt of*
13 *the certified mail. If a person to whom a citation is directed refuses to*
14 *accept delivery of the certified mail, the date of service shall be*
15 *deemed to be the date of mailing.*

16
17 *(b) Each citation shall be in writing and shall describe the nature of the*
18 *violation or violations, including a reference to the statutory provision,*
19 *standard, order, citation, permit, or regulation alleged to have been*
20 *violated.*

21
22 *(c) A citation may specify a date for elimination or correction of the*
23 *condition constituting the violation.*

24
25 *(d) A citation may include the assessment of a penalty as specified in*
26 *subdivision (e).*

1
2 (e) The department may assess a penalty in an amount not to exceed
3 one thousand dollars (\$1,000) per day for each day that a violation
4 occurred, and for each day that a violation continues to occur. A
5 separate penalty may be assessed for each violation.
6
7

8 Section 64675.5, Title 22, of the CCR states in relevant part:
9

10 (a) A system shall conduct standard tap sampling for two
11 consecutive periods; thereafter, tap sampling frequency may be
12 reduced pursuant to section 64675 (General Requirements for
13 Tap Sampling for Lead and Copper) as follows:
14

15 (1) If a system has 90th percentile levels that do not exceed
16 0.005 mg/L for lead and 0.65 mg/L for copper for two
17 consecutive periods, it may reduce the sampling to once every
18 three years at the reduced number of sites.
19

20
21 Section 64690.1, Title 22, of the CCR states in relevant part:
22

23 Each system shall report the following within the first 10 days after the
24 end of each period during which such sampling or monitoring was
25 conducted:
26

1 (a) For lead and copper tap sampling:

2
3 (1) The results of all tap samples including the location of each
4 site and the associated tier criteria from section 64676
5 (Sample Site Selection);

6
7 (2) The 90th percentile lead and copper concentrations calculated
8 pursuant to section 64678 (Determination of Exceedances of
9 Lead and Copper Action Levels); and

10
11 (3) With the exception of the first period of tap sampling, an
12 identification of any site that was not sampled during previous
13 periods, along with an explanation of why the sampling site
14 was changed;

15
16 **STATEMENT OF FACTS**

17 The Orland Mobile Home Park (Water System) is classified as a community water
18 system serving approximately 95 people. Because the Water System meets a
19 reduced lead and copper sampling frequency, it is required to collect five (5) lead and
20 copper samples every three years according to Table 64675-A and section 64675.5 of
21 Title 22. The Water System failed to collect and report lead and copper samples at
22 the end of the triennial period in 2014. The last samples submitted to the Division
23 were taken in August of 2011.

1 **DETERMINATIONS**

2 The Division has determined that the Water System violated Section 64675.5(a)(1)
3 and Section 64690.1, Title 22, of the CCR, in that the Water System failed to collect
4 and report triennial samples in 2014.

5
6 **DIRECTIVES**

7 The Water System is hereby directed to take the following actions:

- 8
- 9 1. Comply with Section 64675.5, Title 22, of the CCR in all future monitoring
10 periods.
- 11
- 12 2. **Conduct lead and copper monitoring from customer's taps in June,**
13 **July, August, or September of 2015, and then again in June, July,**
14 **August, or September of 2017. Thereafter, sampling may resume to**
15 **triennial.** Samples shall be collected in accordance with the Lead and
16 Copper Rule Sampling per Title 22, Section 64677. The analytical results
17 must be reported to the Division by the 10th day of the month following the
18 month in which the analysis was completed.
- 19
- 20
- 21 3. The Water System shall provide public notification (by inclusion in the **2014**
22 **Consumer Confidence Report**) of the failure to sample lead and copper,
23 as required by the Lead and Copper regulations.
- 24
- 25

26 All documents required by this Citation to be submitted to the Division shall be
27 submitted to the following address:

Reese B. Crenshaw, P. E.
Valley District Engineer
Drinking Water Field Operations
Division of Drinking Water
State Water Resources Control Board
364 Knollcrest Drive, Suite 101
Redding, CA 96002
(530) 224-4800

Nothing in this Citation relieves the Water System of its obligation to meet the requirements of Health and Safety Code, Division 104, Part 12, Chapter 4 (California Safe Drinking Water Act), or any regulation, permit, standard or order issued or adopted thereunder.

The Division reserves the right to make such modifications to this Citation, as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Citation and shall be effective upon issuance.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the Board to: issue citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any permit, regulation, permit or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Board to take action to suspend or revoke a permit that has been issued to a public water system if the system has violated applicable law or regulations or has failed to



1 comply with an order of the Board; and to petition the superior court to take various
2 enforcement measures against a public water system that has failed to comply with
3 violates an order of the Board. The Board does not waive any further enforcement
4 action by issuance of this citation.

5
6 **PARTIES BOUND**

7 This Citation shall apply to and be binding upon the Water System, its officers,
8 directors, agents, employees, contractors, successors, and assignees.

9
10 **SEVERABILITY**

11 The directives of this Citation are severable, and the Water System shall comply with
12 each and every provision thereof notwithstanding the effectiveness of any other
13 provision.

14
15
16 

17 _____
18 Reese B. Crenshaw, P.E., District Engineer
19 Valley District
20 Drinking Water Field Operations Branch

3/9/15

Date

